

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Clifford Mahaley, employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, having been duly sworn, do hereby depose and state as follows:

**INTRODUCTION**

1. Your affiant is an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7). Your affiant is therefore, an officer of the United States who is empowered by law to conduct investigations and to make arrest for the offenses enumerated in Title 18, United States Code, Section 2516. Your affiant is currently assigned to ATF San Juan conducting investigations of federal firearms violations and other federal violations. Your affiant was also previously employed by the City of Charlotte, North Carolina as a Police Officer for several years.
2. Your affiant has conducted investigations into the unlawful possession of firearms. Through training, investigations, and experience, I have taken part in cases relating to the trafficking of firearms, the use and possession of firearms by persons prohibited by law, and the possession of illegal firearms. Your affiant is familiar and has participated in various methods of investigations, including, but not limited to: electronic surveillance, physical surveillance, interviewing and general questioning of witnesses, use of confidential informants, use of cooperating witnesses, and use of toll records and subscribers information.
3. Your affiant has conducted and participated in numerous investigations to include: crime scene investigations, collection of evidence, interviews, and the execution of search warrants.

4. The details and information stated herein are based on my training, experience, and personal knowledge and compilation of facts and events investigated by me and other Law Enforcement Officers who investigated and confirmed their veracity or oversaw their development. I have drafted this affidavit for the limited purpose of establishing probable cause that **Juan JIMENEZ-VELAZQUEZ** violated **Title 18, United States Code, Section 922(g)(1) (possession of a firearm and ammunition by a convicted felon)**. Therefore, I have not included all of the facts of this investigation.

#### **FACTS SUPPORTING PROBABLE CAUSE**

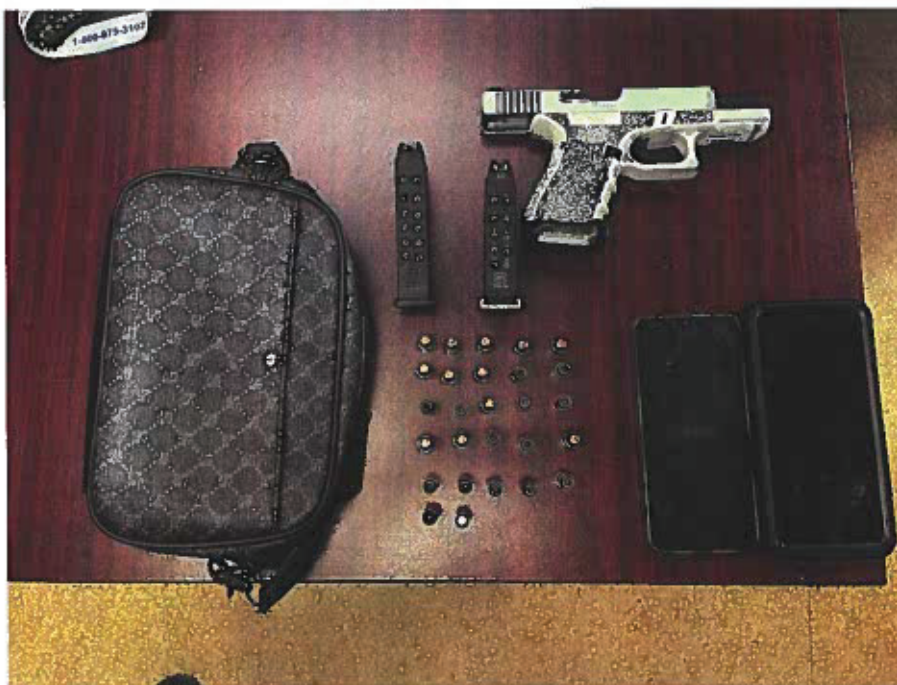
5. On or about May 20, 2025, at approximately 6:15 p.m., Agents with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) were contacted by agents of the Puerto Rico Police Bureau (PRPB), Intelligence Unit in Caguas, regarding a possible violation of Title 18, United States Code, Sections 922(g)(1).
6. According to PRPB Agents, earlier that same day at approximately 4:10 p.m., they were conducting a planned arrest warrant operation in the Celadas Ward area in Caguas, Puerto Rico. While searching for the individual named in the arrest warrant (the Target), PRPB Agents observed the Target accompanied by two other males standing next to a disabled vehicle in front of House 382 on Street 33, within the Ward.
7. PRPB Agents approached the individuals in an unmarked vehicle and attempted to take the Target into custody. Upon exiting the vehicle, all three individuals fled on foot. The Target and one of the other males successfully eluded the PRPB Agents. The third individual, later identified as **Juan M. JIMENEZ-VELAZQUEZ**, was slower to flee. PRPB Agents observed JIMENEZ-VELAZQUEZ attempting to remove a black purse from his body while running. During the foot

pursuit, he stumbled in a drainage ditch approximately one house away from the initial location and fell into a concrete wall, dropping the purse.

8. PRPB Agents detained JIMENEZ-VELAZQUEZ at that location. The purse he had dropped was open, and PRPB Agents clearly observed a white firearm inside. The firearm was recovered, and JIMENEZ-VELAZQUEZ was placed under arrest.

9. PRPB agents seized the following items from JIMENEZ-VELAZQUEZ:

- One firearm described as a white Glock Model 23 Gen 4, .40 S&W caliber, bearing serial number BFBH267. The firearm was equipped with an internal machine gun conversion device ("chip") and was loaded with one round in the chamber and thirteen rounds in the magazine.
- One Glock magazine loaded with (13) thirteen rounds of .40 S&W caliber ammunition.
- Two black cellular phones found on his person.
- A small quantity of marijuana.
- One black purse.



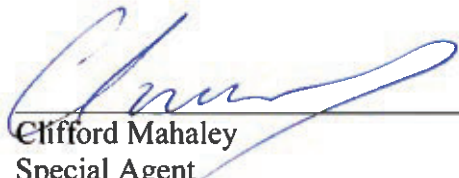
10. JIMENEZ-VELAZQUEZ was transported to Pavia Hospital in Caguas for treatment of minor injuries.
11. On May 21, 2025, at approximately 11:50 a.m., ATF Agents attempted to conduct a custodial interview with JIMENEZ-VELAZQUEZ at the PRPB Caguas Headquarters. After being advised of his Miranda rights, JIMENEZ-VELAZQUEZ stated that he understood his rights and requested an attorney.
12. According to criminal records queries, JIMENEZ-VELAZQUEZ was previously convicted of a crime punishable by imprisonment for a term exceeding one year. On January 12, 2014, he was sentenced to sixty (60) months of probation. Specifically, JIMENEZ-VELAZQUEZ was present at that hearing on January 12, 2014, when he was given a SUSPENDED PRISON SENTENCE for narcotics violations.
13. ATF agents conducted a preliminary function test of the recovered firearm, which confirmed it was capable of discharging more than one round of ammunition with a single function of the trigger.
14. The investigation also determined that there are no commercially manufactured firearms or ammunition produced within the Commonwealth of Puerto Rico. Therefore, the firearm and ammunition in question necessarily traveled in interstate or foreign commerce.

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**CONCLUSION**

15. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that **Juan M. JIMENEZ-VELAZQUEZ** has violated Title 18, United States Code, Section 922(g)(1) (possession of a firearm and ammunition by a convicted felon).

I hereby declare, under penalty of perjury, that the information contained in this Affidavit is known to be true and correct to best of my knowledge.

  
Clifford Mahaley  
Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Subscribed and sworn pursuant to FRCP 4.1 at 5:15 pm by telephone, this 22nd day of May, 2025.

  
Hon. Giselle López-Soler  
United States Magistrate Judge  
United States District Court  
District of Puerto Rico

 Hon. Giselle López-Soler